mandum Mandum

11 (+ A 10 10 11

ATTN OF 153 (A. Paripertaap, 3-8191)

SUBJECT Comments on the Rocky Flats Final Treatability Studies Plan

Frazer Lockhart, RF

- Attached are Office of Environmental Restoration (EM-45) comments and recommendations regarding the Rocky Flats Final Treatability Studies Plan (TSP) dated June 3, 1991. Key comments are as follows; please see the attachment for a more detailed discussion.
 - Integration of all technologies being addressed by the Office of Technology Development (EM-50) should be noted and their applicability evaluated. Also, the fact that innovative technologies are not being actively pursued by RFP, because time constraints effectively limit selection and evaluation to well-developed technologies, should be addressed.
 - The testing of stabilization technologies on untreated soils should be examined more carefully since these technologies could generate large quantities of materials which would have to be disposed.
 - The proposed pilot scale testing with oxidation of volatile organic compounds does not seem appropriate because the 881 Hillside Treatment Facility will use this process. If the proposed pilot scale testing is the start-up testing of the 881 Hillside Treatment Facility, it should be so indicated in the report.
 - In the presentation of the operable units (OUs), it is difficult for the reader to locate the units relative to the site since only a very brief discussion is presented. OU locations should be delineated on a map.
 - There should be a discussion of waste minimization efforts in Environmental Restoration activities at Rocky Flats.

Please address the comments and recommendations in the TSP. As you are aware, guidance is being prepared regarding the necessity of headquarters review on documents of this type. This will avoid the situation that

occurred on this report, where headquarters received the document at the same time it was sent to the regulatory agencies.

If you have any questions regarding this matter, please contact me at FTS 353-8190 or Autar Rampertaap of my staff at FTS 353-8191.

Raymond I. Greenberg Chief Decontamination and Decommissioning Branch Division of Southwestern Area Programs Office of Environmental Restoration

Attachment

cc w/Attachment: Tom Anderson, EM-551 Lawnie Taylor, EM-43